

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Southern District of New York
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September 21, 2023

BY EMAIL AND ECF

The Honorable Judge Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Morrow-Wu et al
23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

I write to respectfully request that the Court modify the conditions of Mr. Matthew Morrow-Wu's bond to allow him to stay in the District of New Jersey when visiting New York City for court appearances and/or medical appointments. Pretrial Services of the Eastern District of Tennessee (the supervising Pretrial Services Agency) has no objection to this request. The Government and Pretrial Services of the Southern District of New York have not yet provided their positions regarding this request, but there is good cause to grant it.¹

The proposed modification would allow Mr. Wu to save a significant amount of money on lodging when he travels to New York City. If granted, Mr. Wu would be permitted to stay at the home of a close friend, Victor Ho, who resides at 24 Rock Street, Jersey City, New Jersey 07306. Mr. Wu has already provided Pretrial Services with Mr. Ho's name and contact information. If Mr. Ho cannot host Mr. Wu during a particular visit to New York, Mr. Wu would still be permitted to stay at a hotel in New Jersey, which are less expensive than the options available in New York City. Mr. Wu is currently receiving treatment for several health conditions, some of which require costly medications or medical procedures. Granting this request would alleviate some of the financial stress posed by his medical needs and regular trips to New York.

On June 7, 2023, your Honor ordered Mr. Wu released to home detention at his sister's residence in Oneida, Tennessee subject to a \$75,000 personal recognizance bond secured by his sister's vehicle, cosigned by two financially responsible persons, Pretrial supervision, travel restricted to the Eastern District of Tennessee and Southern Eastern Districts of New York, and the surrender of travel documents with no new applications. On August 1, 2023, your Honor granted Mr. Wu's requests to modify the conditions of his bond to allow him to visit New York City for medical appointments and to allow him to stay overnight when visiting New York City. Since his release three months ago, Mr. Wu has remained compliant with all conditions of his release.

If the proposed request is granted, Mr. Wu would continue report to Pretrial Services upon his arrival in the Southern District of New York, and if requested by Pretrial, be outfitted with a

¹ Undersigned counsel requested the positions of the Government and New York Pretrial Services last week but has not yet received a response.

So ordered
9-27-23
Alvin K. Hellerstein

September 21, 2023

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location monitoring device. Mr. Wu would continue to provide Pretrial with his itinerary ahead of time, including his flights and hotel information.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ _____

Zawadi S. Baharanyi

Assistant Federal Defender

(917) 612-2753

cc: AUSA Jerry Fang
USPSO Shauna McCullough-Walker (EDTN)
USPSO Ashley Cosme (SDNY)

SO ORDERED:

HONORABLE ALVIN K. HELLERSTEIN
United States District Judge